

**From:** [Brad Edwards](#)  
**To:** [O'Laughlin, Andy](#)  
**Cc:** [WHJPMCServices](#); [DoeService](#); [DL - Motley Rice JPMC Service](#)  
**Subject:** Re: JPMC - DB Jane Doe Identity  
**Date:** Saturday, April 8, 2023 1:39:48 PM

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**EXTERNAL SENDER**

Andy,

Thank you for your email below. I don't think a back and forth on this topic would be productive. I am more than happy to have the Court decide this issue and in fact want it brought to the Court's attention as soon as possible.

Unfortunately, while I will be the person on our team handling this issue with the Court, I am not available Monday. I will, however, make myself available anytime on Tuesday.

I hope you are having a nice weekend.

Sincerely,

Brad

Sent from my iPhone

On Apr 7, 2023, at 5:45 PM, O'Laughlin, Andy  
<[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)> wrote:

Brad,

As we have explained, we have reason to believe that the Jane Doe in the Deutsche Bank case is a percipient witness in possession of facts that are directly relevant to the claims and defenses in this case. We are not aware of any legal basis that would support you withholding it from us—nor, it seems, are you given that you have agreed to provide it. We are also not aware of any legal basis for withholding the name of a percipient witness from one of the parties to the litigation.

We understand the confidentiality concerns here and take the protection of all victim's identities seriously. We have all agreed to abide by the Protective Orders governing these cases which are designed to address these concerns but we do not read those orders as supporting, or allowing for, the restriction you request.

If you believe that additional protections are warranted, or of any legal grounds for the position you are taking below—that our access to relevant information regarding our defense must be conditioned on our agreeing that another party not have that access—then please provide it.

Barring further explanation or authority to support your position, we cannot agree to the conditions you have imposed and will need to find a time on Monday to seek the Court's assistance in resolving this dispute. Please let us know when works.

Best,

Andy

Andy O'Laughlin  
**WilmerHale** | 617.526.6220

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**From:** Brad Edwards <brad@epllc.com>  
**Sent:** Friday, April 7, 2023 3:48 PM  
**To:** O'Laughlin, Andy <Andy.OLaughlin@wilmerhale.com>  
**Cc:** WHJPMCSERVICE <WHJPMCSERVICE@wilmerhale.com>; DoeService <DoeService@bsfllp.com>; DL - Motley Rice JPMC Service <DL-MotleyRiceJPMCSERVICE@motleyrice.com>  
**Subject:** Re: JPMC - DB Jane Doe Identity

**EXTERNAL SENDER**

Andy,

Please provide written confirmation that her identity will not be shared with Mr. Staley or his counsel, regardless of how the Court rules on severance, and we will provide you the name. Thank you.

Brad

Sent from my iPhone

On Apr 7, 2023, at 3:40 PM, O'Laughlin, Andy  
<[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)> wrote:

Brad,

Following up on the below, we are still waiting on the name. This request has been pending for ten days and it has now been two days since you agreed you would provide it. Please provide it today.

Best,

Andy

Andy O'Laughlin

**WilmerHale** | 617.526.6220

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**From:** O'Laughlin, Andy

**Sent:** Thursday, April 6, 2023 10:52 AM

**To:** Brad Edwards <[brad@epllc.com](mailto:brad@epllc.com)>

**Cc:** WHJPMCSERVICE <[WHJPMCSERVICE@wilmerhale.com](mailto:WHJPMCSERVICE@wilmerhale.com)>; DoeService <[DoeService@bsflp.com](mailto:DoeService@bsflp.com)>; [swohlgemuth@wc.com](mailto:swohlgemuth@wc.com); Warren, Zach <[ZWarren@wc.com](mailto:ZWarren@wc.com)>; DL - Motley Rice JPMC Service <[DL-MotleyRiceJPMCSERVICE@motleyrice.com](mailto:DL-MotleyRiceJPMCSERVICE@motleyrice.com)>

**Subject:** RE: JPMC - DB Jane Doe Identity

Thanks very much Brad, can you please provide it today?

Andy O'Laughlin

**WilmerHale** | 617.526.6220

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**From:** Brad Edwards <[brad@epllc.com](mailto:brad@epllc.com)>

**Sent:** Wednesday, April 5, 2023 10:29 PM

**To:** O'Laughlin, Andy <[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)>

**Cc:** WHJPMCSERVICE <[WHJPMCSERVICE@wilmerhale.com](mailto:WHJPMCSERVICE@wilmerhale.com)>; DoeService <[DoeService@bsflp.com](mailto:DoeService@bsflp.com)>; [swohlgemuth@wc.com](mailto:swohlgemuth@wc.com); Warren, Zach <[ZWarren@wc.com](mailto:ZWarren@wc.com)>; DL - Motley Rice JPMC Service <[DL-MotleyRiceJPMCSERVICE@motleyrice.com](mailto:DL-MotleyRiceJPMCSERVICE@motleyrice.com)>

**Subject:** Re: JPMC - DB Jane Doe Identity

**EXTERNAL SENDER**

Andy,

We will provide you the name.

Brad

Sent from my iPhone

On Apr 5, 2023, at 8:35 PM, O'Laughlin, Andy  
<[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)> wrote:

Brad,

Last Tuesday 3/28 we asked your team to provide us with the name of the Jane Doe in the Deutsche Bank case, you said that you would get back to us. On yesterday's meet and confer, having not heard back, we repeated the request and again explained our basis for seeking it. You agreed to provide us with your response today which we have not yet received. Please either provide the name or confirm that we are at impasse on this issue so we can proceed to next steps.

Best,

Andy

**Andy O'Laughlin | WilmerHale**

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Boston, MA 02109 USA

+1 617 526 6220 (t)

+1 617 526 5000 (f)

[andy.olaughlin@wilmerhale.com](mailto:andy.olaughlin@wilmerhale.com)

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